No. 88-327

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Supreme Court, U.S.
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IN THE

Supreme Court of the United States

OCTOBER TERM, 1988

BUDDY ROEMER, *et al.*,

Petitioners,

v.

RONALD CHISOM, *et al.*,

Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT

BRIEF OF RESPONDENTS IN OPPOSITION

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Question Presented

In amending section 2 of the Voting Rights Act of 1965, 42 U.S.C. § 1973, did Congress intend to exempt from scrutiny racially discriminatory methods of electing state court judges?

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No 88-327

IN THE
SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1988

BUDDY ROEMER, et al.,

Petitioners,

v.

RONALD CHISOM, et al.,

Respondents.

On Petition For A Writ of Certiorari
To The United States Court Of Appeals
For The Fifth Circuit

BRIEF OF RESPONDENTS IN OPPOSITION

Respondents Ronald Chisom et al. oppose the petition of Governor Buddy Roemer et al. for a writ of certiorari to review the opinion and judgment entered by the United States Court of Appeals for the Fifth Circuit on February 29, 1988.

Statement of the Case

The Louisiana Supreme Court consists of seven justices who are chosen by popular election. Five of the seven justices are elected from geographically defined single-member districts. The other two justices are elected from the only multi-member district--the First Supreme Court District. The First Supreme Court District contains Orleans, St. Bernard, Plaquemines, and Jefferson Parishes. Orleans Parish, which contains the city of New Orleans, is predominantly black in both total population and registered voters. The other three parishes are overwhelmingly white. Justices serve ten-year terms, and the election terms of the two justices from the First Supreme Court District are staggered. No black person has been elected to the Louisiana

Supreme Court, either from the First Supreme Court District or from any of the other five districts, in modern times.

Respondents Ronald Chisom, Marie Bookman, Walter Willard, Mark Morial, and Henry Dillon, III, are black registered voters in Orleans Parish, who represent a class of similarly situated persons. Respondent Louisiana Voter Registration/ Education Crusade is a nonprofit corporation active in voting rights issues in Orleans Parish.

Respondents filed a complaint challenging the method of electing Louisiana Supreme Court Justices from the First Supreme Court District. They alleged both that the present election scheme submerged Orleans Parish's predominantly black electorate in a majority-white, multimember district in violation of the "results test" of section 2 of the Voting

Rights Act of 1965 as amended, 42 U.S.C. § 1973, and that it violated the Fourteenth and Fifteenth Amendments to the Constitution of the United States because the purpose and effect of placing Orleans Parish in a multimember district was to dilute black voting strength.[1]

With regard to respondents' claim under section 2, the complaint alleged the following facts relevant to the "results" test:[2] a long history of offi-

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[1] Petitioners have not sought review in this Court of the holding of the Court of Appeals that respondents have stated a claim under the Fourteenth and Fifteenth Amendments. Chisom v. Edwards, 839 F.2d 1056, 1064-65 (5th Cir. 1988) (App. to Pet. for Cert. 24-25). See this Court's Rule 21.1(a).

[2] The contours of the "results" test are contained in the Senate Report that accompanied the 1982 amendments. S. Rep. No. 97-417 (1982) [hereafter "Senate Report"]. This Court has termed the Senate Report an "authoritative source" for interpreting the results test. Thornburg v. Gingles, 478 U.S. 30, 43 n. 7 (1986).

cial racial discrimination within the First Supreme Court District; widespread racially polarized voting within the First Supreme Court District; the socio-economically depressed status of black residents of the First Supreme Court District; the low percentage of black elected officials within the First Supreme Court District, including the absence of any black justices on the Louisiana Supreme Court; and the lack of any state policy justifying the use of a multimember district in the Orleans Parish area when all other Supreme Court Justices were elected from single-member districts.[3] In addition, respondents

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[3] The Senate Report contains a list of nine "[t]ypical factors" that may establish a violation of the results test. Senate Report at 28-29. The Report expressly states that "there is no requirement that any particular number of factors be proved, or that a majority of them point one way or the other." Id. at 29. In their amended complaint, respon-

alleged that it would be possible to create a single-member district consisting of Orleans Parish that would be majority-black both in total population and in number of registered voters. See Thornburg v. Gingles, 478 U.S. 30, 50 (1978).[4]

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dents made allegations concerning the first, second, third, fifth, seventh, and ninth factors.

[4] Under this Court's decision in Wells v. Edwards, 409 U.S. 1095 (1973), summarily aff'g 347 F. Supp. 453 (M.D. La. 1972), the principle of one-person, one-vote does not apply to the districts used to elect members of the Louisiana Supreme Court. The 1980 population of the First Supreme Court District is 1,102,253; the population of the largest single-member district is approximately 861,000, while the population of the smallest is approximately 411,000. See App. to Pet. for Cert. 47.

Respondents' complaint alleged that it would be possible to divide the present First Supreme Court District into an overwhelmingly white district consisting of the three suburban parishes having a total population of 544,738, and a majority-black district consisting of Orleans Parish having a population of 557,515. The Orleans Parish-based district would thus contain 50.58 percent of the popula-

In an opinion and order dated May 1, 1987, and subsequently amended on July 10, 1987, the United States District Court for the Eastern District of Louisiana (Charles Schwartz, Jr., J.) granted petitioners' motion to dismiss respondents' section 2 claims on the ground that section 2 does not cover judicial elections. Chisom v. Edwards, 659 F. Supp. 183 (E.D. La. 1987) (App. to Pet. for Cert. 28).

On February 29, 1988, a unanimous panel of the Court of Appeals for the Fifth Circuit (John R. Brown, Sam D. Johnson, and Patrick E. Higginbotham, JJ.) reversed the judgment of the district court and held that section 2 applies to judicial elections. Chisom v. Edwards, 831 F.2d 1056 (5th Cir. 1988)

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tion of the current First Supreme Court District.

(App. to Pet. for Cert. 4). A subsequent petition for rehearing and suggestion for rehearing en banc was unanimously denied.

Summary of Reasons for Denying the Writ

The question whether section 2 of the Voting Rights Act applies to judicial elections does not warrant this Court's review. This Court has unanimously held that a complementary provision of the Act covers judicial elections. Martin v. Haith, 477 U.S. 901 (1986). The decision of the Court of Appeals in this case is consistent with this Court's holding in Martin; with the holding of the only other court of appeals to address the question whether section 2 covers judicial elections, Mallory v. Eyrich, 839 F.2d 275 (6th Cir. 1987); with the language and legislative history of the Voting Rights Act; and with the Attorney

General's interpretation of the Act, to which this Court has consistently given great deference, see, e.g., United States v. Board of Commissioners, 435 U.S. 110, 131 (1978).

Reasons for Denying the Writ

I.

THIS COURT HAS ALREADY HELD THAT THE VOTING RIGHTS ACT COVERS JUDICIAL ELECTIONS

Petitioners refer to a number of cases involving challenges under the Voting Rights Act to judicial elections. Pet. for Cert. 6-9. They fail, however, to mention the most significant decision: this Court's summary, unanimous holding, in Martin v. Haith, 477 U.S. 901 (1986), that a complementary provision of the Voting Rights Act--section 5, 42 U.S.C. §

1973c--covers judicial elections.[5]

Section 5, which requires certain jurisdictions (including Louisiana) to obtain federal approval prior to implementing any changes in their method of electing public officials, and section 2, which contains a nationwide ban on the use of election practices which result in the dilution of minority voting strength, were intended to be interpreted in tandem. The House Report accompanying the 1982 amendment of section 2 and extension of section 5 expressly stated:

> Under the Voting Rights Act, whether a discriminatory practice or procedure is of recent

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[5] That holding effectively answers petitioners' ostensibly rhetorical question, "If a state, such as Louisiana, chooses to change its judicial selection process from an electoral system to one of appointment and/or merit, must it preclear such a change when most of the other forty-two states that elect judges need not preclear such a change?" Pet. for Cert. 5. Martin's precise holding is that the answer to that question is "Yes."

> origin affects on the mechanism that triggers relief, i.e., litigation [under section 2] or preclearance [under section 5]. The lawfulness of such a practice should not vary depending on when it was adopted, i.e., whether it is a change.

H.R. Rep. No. 97-227, p. 28 (1982) [hereafter "House Report"] (emphasis added); see also Senate Report at 5-6.

If the lawfulness of an electoral practice does not vary depending on its date of adoption, then this Court's holding in Martin--that the adoption of a particular system for electing judges may be forbidden when that system has either the purpose or the effect of diluting black voting strength--necessarily requires that the continued use of a particular system for electing judges must also be subject to scrutiny under section 2. Under Martin, it is clear beyond dispute that if Louisiana now used a different system for electing judges, it

could be forbidden from creating a multi-member district containing Orleans Parish and three suburban, majority-white parishes if that plan had the effect of diluting black voting strength.[6] The import of petitioners' argument therefore is that Louisiana's longstanding use of such a system should somehow be immune from attack under the Voting Rights Act. The Court of Appeals properly held that such a result would be "totally inconsistent with the broad remedial purpose of the Act," 839 F.2d at 1064 (App. to Pet.

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[6] Under section 5, a state cannot implement a change in its methods of electing public officials if the change would have either the purpose or the effect of diluting minority voting strength. 42 U.S.C. § 1973c. In section 5 cases, the burden of proof lies on the submitting jurisdiction, whereas in section 2 cases, the plaintiffs bear the burden of proof. Thus, it is entirely possible in close cases that a state will be denied preclearance of a change which, if it had been the existing practice, private plaintiffs would be unable to attack successfully.

for Cert. 23), which was to "create a set of mechanisms for dealing with continued voting discrimination, not step by step, but comprehensively and finally," Senate Report at 5.

II.

BOTH COURTS OF APPEALS THAT HAVE CONSIDERED THE QUESTION HAVE CONCLUDED THAT SECTION 2 APPLIES TO JUDICIAL ELECTIONS

Petitioners seek to show the importance of this Court's granting certiorari by pointing out that states within eleven of the Circuits elect judges. Pet. for Cert. 10-11. That fact, however, provides no basis for granting certiorari here, in light of the now unanimous consensus among the lower courts that section 2 applies to judicial elections. See Chisom v. Edwards, 839 F.2d 1056 (5th Cir. 1988); Mallory v. Eyrich, 839 F.2d 275 (6th Cir. 1987); Clark v. Edwards,

No. 86-435-A (M.D. La. Aug. 15, 1988); Williams v. State Board of Elections, No. 88C-2377 (N.D. Ill. Aug. 4, 1988); Martin v. Allain, 658 F. Supp. 1183 (S.D. Miss. 1987); see also Kirksey v. Allain, 635 F. Supp. 347 (S.D. Miss. 1986) (three-judge court) (section 5 applies to judicial elections); Haith v. Martin, 618 F. Supp. 410 (E.D.N.C. 1985) (three-judge court) (same), aff'd, 477 U.S. 901 (1986). In fact, the only two lower court judges to suggest that section 2 does not apply were both unanimously reversed by their respective courts of appeals in Chisom and Mallory. Thus, there is no conflict or confusion among the circuits.

III.

THE LANGUAGE, LEGISLATIVE HISTORY, AND EXECUTIVE CONSTRUCTION OF THE VOTING RIGHTS ACT SHOW THAT IT WAS INTENDED TO COVER JUDICIAL ELECTIONS

A. The Language of the Act

By its terms, section 2 covers all elections. Section 2(a) contains an absolute prohibition on racial discrimination in voting:

> No voting qualification or prerequisite to voting or standard, practice, or procedure shall be imposed or applied by any State . . . in a manner which results in a denial or an abridgement of the right of any citizen of the United States to vote on account of race or color . . . .

42 U.S.C. § 1973(a) (emphasis added). Section 14(c)(1) of the Act, which defines "voting" for purposes of the Act, convincingly shows that Congress intended for section 2 to reach all elections:

> The terms "vote" or "voting"

> shall include all action necessary to make a vote effective in any primary, special, or general election, including, but not limited to, . . . having such ballot counted properly and included in the appropriate totals of votes cast with respect to candidates for public or party office and propositions for which voters are received in an election.

42 U.S.C. § 1973l(c)(1) (emphasis added). Thus, neither the substantive nor the definitional sections of the Act provides any exclusion from the Act's coverage for particular types of elections. Aspirants for elective judicial positions are undeniably "candidates for public . . . office" and the procedures by which they attain those offices are undeniably "elections." Thus, section 2 by its terms outlaws schemes for electing judges that result in the denial or abridgment of equal voting strength for black citizens.

B. The Legislative History

This Court has frequently noted Congress' "intention to give the Act its broadest possible scope." Allen v. State Board of Elections, 393 U.S. 544, 566-57 (1969). The Act originated as H.R. 6400, a bill drafted by the Johnson Administration. This Court has recognized, "in light of the extensive role" that Attorney General Nicholas Katzenbach "played in drafting the statute and explaining its operation to Congress," that great weight should be afforded his testimony. United States v. Board of Commissioners, 435 U.S. at 131 & n. 20. Attorney General Katzenbach made clear, in response to questions from committee members, that "[e]very election in which registered electors are permitted to vote would be covered" by the Act. Voting Rights:

Hearings Before Subcommittee No. 5 of the House Judiciary Comm. on H.R. 6400 and Other Proposals To Enforce the Fifteenth Amendment to the Constitution of the United States, 89th Cong., 1st Sess. 21 (1965). See also id. at 67, 121 (discussing how Act will reach all elections). As the three-judge court whose opinion this Court summarily affirmed in Martin explained, "the Act applies to all voting without any limitation as to who, or what, is the object of the vote." Haith v. Martin, 618 F. Supp. at 413 (emphasis in original).

Moreover, as this Court explained in City of Mobile v. Bolden, 444 U.S. 55, 61 (1980) (plurality opinion), section 2 as enacted in 1965 "simply restated the prohibitions already contained in the Fifteenth Amendment . . . ." It defies belief to suggest that the Fifteenth

Amendment does not cover judicial elections:[7] if that were so, then States would be free explicitly to restrict the franchise in judicial elections solely to white voters, and that cannot be the law. Thus, at its enactment, section 2 must also have covered judicial elections.[8]

C. **The 1982 Amendments**

In 1982, Congress amended section 2 to overturn the plurality holding in Bolden that section 2 required a showing of discriminatory purpose. Thornburg v. Gingles, 478 U.S. at 35; Senate Report at

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[7] Indeed, petitioners do not press that point here. See supra note 1.

[8] Indeed, a major impetus for the passage of the Civil Rights Act of 1964 and the Voting Rights Act of 1965 was the inability or unwillingness of elected state court judges in the South to protect the constitutional rights of black citizens. For an illuminating account of the treatment of black citizens by the elected state judiciary during the period immediately preceding the passage of the two Acts, see generally Southern Justice (L. Friedman ed. 1965).

2. Petitioners' entire argument ultimately boils down to a claim that, by using the phrase "representatives of their choice" in explicating the results test, Congress intended to exclude judicial elections from section 2.

The legislative history simply does not support petitioners' claim. To the contrary, both supporters and opponents of amended section 2 assumed it covered judicial elections. Thus, the Senate and House Reports used the words "representatives," "candidate," and "elected official" interchangeably, see, e.g., Senate Report at 16, 28, 29, 30, 31 & 67; House Report at 4, 18, and relied, in discussing progress under the Act, on figures regarding the number of black elected officials that explicitly included elected judges, see, e.g., House Report at 7-9; see also S. Rep. No. 94-295, p. 14

(1975).[9] Cf. Senate Report at 151 (minority views of Sen. Hatch) (section 2 reaches "all governmental units, including . . . judicial districts . . . as well as state legislatures"). In light of these references and Congress' clear purpose--to expand the protection afforded black voters by section 2--it makes no sense to assume that Congress sub silentio removed judicial elections from scrutiny under section 2.

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[9] The U.S. Commission on Civil Rights and the Bureau of the Census have similarly included minority jurists within their descriptions of minority elected officials. See, e.g., U.S. Commission on Civil Rights, The Voting Rights Act: Ten Years After 377 (1975); U.S. Commission on Civil Rights, The Voting Rights Act: Unfulfilled Goals 27-28 (1981) (blacks were rarely elected to "law enforcement positions (including sheriffs and judges") (emphasis added); U.S. Dept. of Commerce, Bureau of the Census, Statistical Abstract of the United States 1986, at 252 (106th ed. 1985).

D. The Executive Construction of Section 2

As petitioners note, the Attorney General has certified this to be a case of general public importance. Pet. for Cert. 5. What petitioners fail to mention is that he did so in the context of a motion by the United States to intervene as a plaintiff in this lawsuit. See 42 U.S.C. § 2000h-2 (conferring right of intervention on Attorney General when he certifies that an action seeking relief under the Fourteenth Amendment is of general public importance).[10] Paragraph 13 of the United States' complaint in intervention alleges, as did respondents' complaint, that the current method of electing the two justices from the First Supreme Court District violates the

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[10] The Solicitor General has also filed a Brief in Opposition to this petition for certiorari.

results test of section 2. Thus, the Attorney General, to whose construction of the Act this Court has traditionally paid substantial deference, see, e.g., United States v. Board of Commissioners, 435 U.S. at 131, has consistently taken the position that section 2 covers all elections and has expressly interpreted section 2 to cover judicial elections.

IV.

THE DISTINCTIVE NATURE OF JUDICIAL OFFICES DOES NOT CREATE A CERTWORTHY ISSUE

The bulk of petitioners' argument revolves around the special functions performed by judicial officers to explain why such officials should not be viewed as representatives. That argument, however, misses the point. Louisiana has decided to fill its bench by allowing the State's voters to choose judges through popular elections. Thus, while judges

may serve the public in a very different way than city council members, or state legislators,[11] the fact remains that Louisiana has concluded that judges are not so different from other public officials that elections are an inappropriate selection device. Having allowed all qualified voters to participate directly in the judicial selection process, the State cannot use a process that values the votes of white citizens and black citizens differently, by diluting the opportunity of black citizens to elect their preferred candidates.

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[11] In any event, state nomenclature cannot be allowed to dictate the scope of section 2's coverage. For example, under Arkansas law, the chief executive official of a county is the "county judge," Ark. Code. Ann. § 14-14-502(a)(2)(A)(i), and in Massachusetts, the official name of the state legislature is the "General Court," Mass. Const. Pt. 2, Ch. I, § I, Art. I.

V.

IN ANY EVENT, THE ESSENTIALLY INTERLOCUTORY NATURE OF THIS CASE MAKES IT INAPPROPRIATE TO GRANT CERTIORARI

The Court of Appeals did not decide that Louisiana's present scheme for electing Supreme Court Justices from the First Supreme Court District violates either the Constitution or section 2. Nor did it decide that Louisiana must adopt single-member districts. All it decided was that respondents had stated a claim, which they should be given the opportunity to prove at trial.[12] Moreover, because petitioners have not sought certiorari on the question whether the Constitution covers claims of racial vote dilution in judicial elections, this case will have to be tried regardless of

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[12] Judge Schwartz has set the trial in this case for December 14, 1988.

whether this Court grants certiorari and reverses on the question presented.

Conclusion

For the reasons stated, this Court should deny the petition for writ of certiorari.

Respectfully submitted,

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